

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

CITIBANK, N.A., AS TRUSTEE FOR
AMERICAN HOME MORTGAGE ASSETS
TRUST 2006-3, MORTGAGE BACKED
PASS-THROUGH CERTIFICATES SERIES
2006-3,

Plaintiff,

v.

C.A. No. 1:18-cv-00427-JJM

KATHERINE L. CAITO,

Defendant,

v.

INTERNAL REVENUE SERVICE,

Interested Party.

**DECLARATION OF ETHAN Z. TIEGER IN SUPPORT OF APPLICATION FOR
ENTRY OF DEFAULT OF DEFENDANT KATHERINE L. CAITO**

I, Ethan Z. Tieger, hereby declare as follows:

1. I am an attorney with the law firm of Hinshaw & Culbertson LLP, duly admitted to practice law in this Court and the State of Rhode Island, and counsel of record to Plaintiff, Citibank, N.A., as Trustee for American Home Mortgage Assets Trust 2006-3, Mortgage Backed Pass-Through Certificates Series 2006-3 ("Citibank, as Trustee"). All of the facts set forth herein are based upon my personal knowledge.

2. This declaration is submitted in support of Citibank, as Trustee's concurrently-filed Application for Entry of Default of Defendant, Katherine L. Caito ("Defendant").

3. This action was originally commenced on August 3, 2018. Prior to serving the Defendant with a summons and copy of Citibank, as Trustee's Verified Complaint for Judicial Foreclosure, Citibank, as Trustee filed a First Amended Verified Complaint for Judicial Foreclosure (ECF No. 4) ("Amended Complaint") on September 4, 2018.

4. On October 10, 2018, the summons and a copy of the Amended Complaint were served on Defendant individually at 16 Yosemite Valley, Westerly, Rhode Island, as evidenced by the Proof of Service filed by Citibank, as Trustee on October 18, 2018 (ECF No. 9). (Proof of Service, attached hereto as *Exhibit A*.)


5. Following completion of service on Defendant, Defendant's answer or response to Citibank, as Trustee's Amended Complaint was due by October 30, 2018.

6. On October 30, 2018, Defendant filed a Motion for Extension of Time to respond to Citibank, as Trustee's Amended Complaint. By Text Order dated October 31, 2018, this Court extended Defendants' deadline to answer or otherwise respond to the Amended Complaint to November 28, 2018. Defendant did not file an answer or response on November 28, 2018.

5. To date, Defendant has failed to file or serve any response to the Amended Complaint. Defendant has not requested any further extensions and has not provided any good cause as to why default should not enter.

6. To my knowledge, Defendant is not a minor or an incompetent person.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT.


Ethan Z. Tieger

Dated: November 30, 2018

CERTIFICATE OF SERVICE

I, Ethan Z. Tieger, hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on November 30, 2018.

/s/ Ethan Z. Tieger

Ethan Z. Tieger